IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

CHRISTOPHER KOHLS and MARY
FRANSON,

Plaintiffs,

v.

KEITH ELLISON, in his official capacity as
Attorney General of Minnesota, and CHAD
LARSON, in his official capacity as County
Attorney of Douglas County,

Defendants.

Civil Action No. 0:24-cv-3754-LMP-DLM

DECLARATION OF
M. FRANK BEDNARZ IN
SUPPORT OF PLAINTIFFS'
***DAUBERT* MOTION TO**
EXCLUDE EXPERT
DECLARATIONS

I, M. Frank Bednarz, declare as follows:

1.   I have personal knowledge of the facts set forth herein and, if called

as a witness, could and would testify competently thereto.

2.   I am a Senior Attorney with the Hamilton Lincoln Law Institute

("HLLI") and counsel for Plaintiffs in the above-captioned litigation. I submit this

declaration in support of Plaintiffs' *Daubert* Motion to Exclude Expert

Declarations, filed contemporaneously with this declaration.

3.   Attached as **Exhibit 1** is a true and correct copy of the website error

message found at https://doi.org/10.1080/19331681.2022.2151234, which is the URL

cited in the exhibit to Prof. Hancock's expert declaration, Dkt. 23-1 at 39.

4.   Attached as **Exhibit 2** is a true and correct copy of the output from Google Scholar to "author:hwang deepfake," which searches for papers authored by "Hwang," and further filtered to articles published 2023 and later, found at https://scholar.google.com/scholar?as_ylo=2023&q=author:hwang+deepfake&hl=en&as_sdt=0,14.

5.   Attached as **Exhibit 3** is a true and correct copy of the listing of articles contained in volume 20, issue 2 of the JOURNAL OF INFORMATION TECHNOLOGY & POLITICS, found at https://www.tandfonline.com/toc/witp20/20/2.

6.   Attached as **Exhibit 4** is a true and correct copy of Goddard, J, *Hallucinations in ChatGPT: A Cautionary Tale for Biomedical Researchers* (2023), AM. JOURNAL OF MED., 136(11), 1059-1060.

7.   Attached as **Exhibit 5** is a true and correct copy of Hancock, J. T., & Bailenson, J. N. (2021), *The social impact of deepfakes*, CYBERPSYCHOLOGY, BEHAVIOR, AND SOCIAL NETWORKING, *24*(3), 149-152.

8.   Attached as **Exhibit 6** is a true and correct copy of Carl T. Bergstrom & Jevin D. West, CALLING BULLSHIT (2020), Random House, Preface, pp. xi-xvi.

9.   Attached as **Exhibit 7** is a true and correct copy of CALLING BULLSHIT (2020), chapter 2, pp. 18-37.

10.   Attached as **Exhibit 8** is a true and correct copy of CALLING BULLSHIT (2020), excerpt from chapter 8, pp. 192-93.

11.   Attached as **Exhibit 9** is a true and correct copy of CALLING BULLSHIT (2020), excerpt from chapter 11, p. 288.

12.   Attached as **Exhibit 10** is a true and correct copy of Pataranutaporn, P., Archiwaranguprok, C., Chan, S. W., Loftus, E., & Maes, P. (2024), *Synthetic Human Memories: AI-Edited Images and Videos Can Implant False Memories and Distort Recollection*, arXiv preprint arXiv:2409.08895, as found online at: https://arxiv.org/abs/2409.08895.

13.   Attached as **Exhibit 11** is a true and correct copy of Ahmed, S., Bee, A. W. T., Ng, S. W. T., & Masood, M. (2024), *Social Media News Use Amplifies the Illusory Truth Effects of Viral Deepfakes: A Cross-National Study of Eight Countries*, JOURNAL OF BROADCASTING & ELECTRONIC MEDIA, 1-28, https://doi.org/10.1080/08838151.2024.2410783.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15th day of November, 2024, in Chicago, Illinois.

M. Frank Bednarz